

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

ANTHONY OLIVER, TERRY GAYLE  
QUINTON, SHAWN O'KEEFE, ANDREW  
AMEND, SUSAN BURDETTE, GIANNA  
VALDES, DAVID MOSKOWITZ, ZACHARY  
DRAPER, NATE THAYER and MICHAEL  
THOMAS REID on behalf of themselves and all  
others similarly situated,

Plaintiffs,

Case No. 1:19-cv-00566

-against-

AMERICAN EXPRESS COMPANY and  
AMERICAN EXPRESS TRAVEL RELATED  
SERVICES COMPANY, INC.,

Defendants.

**DEFENDANTS' NOTICE OF MOTION TO DISMISS THE CLASS ACTION  
COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in  
Support of Defendants' Motion to Dismiss the Class Action Complaint, Defendants  
American Express Company and American Express Travel Related Services Company,  
Inc., by their attorneys, hereby move this Court, before Honorable Nicholas G. Garaufis,  
at the United States Courthouse for the Eastern District of New York, 225 Cadman Plaza  
East, Brooklyn, New York, 11201, at a date and time to be determined by the Court, for  
an order dismissing the Class Action Complaint for lack of Article III standing pursuant  
to Fed. R. Civ. P. 12(b)(1), or for lack of antitrust standing pursuant to Fed. R. Civ. P.  
12(b)(6); and granting such other and further relief as the Court deems just and proper.

May 1, 2019

CRAVATH, SWAINE & MOORE LLP,

by

/s/ Peter T. Barbur

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